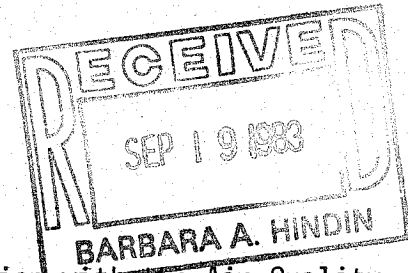




Date: September 13, 1983
Subject: Emissions Meeting With The Montana Air Quality Bureau

From/Location: D. F. Ryan
To/Location: T. F. Payne



Attached is Hal Robbins' write up of our discussion with the Air Quality Bureau concerning our emission standard excursion.

I recommend that we pursue the possibility of malfunction. This would require a fairly thorough write up of our experience with Arco coke and to present it in a way that the AQB can equate it to the rule. The rule ARM 16.8.705 Malfunctions is attached and gives specifics as to reporting requirements. Our argument would be that the anodes unavoidably failed, as a process, due to use of Arco coke.

I would hope that our meeting with the Bureau would fulfill the notification requirements under section (2) of the rule.

The AQB will be discussing this and other aspects of the rule with their legal people, probably Frank Crowley. We should get a legal opinion from our own corporate group.

*on whether
malfunction applies
- in notes*

D. F. Ryan
Technical Superintendent

Attachments (2)

DFR:kg

mc: R. A. Sneddon
L. W. Smith
K. G. Reick
S. J. Seifert
A. J. Canavan
R. W. Simmons
B. A. Hindin
C. F. Hosmer